

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ZELOUF INTERNATIONAL CORP.

Plaintiff,

vs.

NA EL, INC.; et al.

Defendants.

Case No.: 13-CV-1788- ALC

**DECLARATION OF MICHAEL D.
STEGER IN SUPPORT OF DEFENDANT
NA EL, INC.'S REPLY BRIEF IN
SUPPORT OF MOTION TO DISMISS FOR
LACK OF PERSONAL JURISDICTION;
OR, IN THE ALTERNATIVE, TO
TRANSFER VENUE**

I, MICHAEL D. STEGER, hereby declare as follows:

1. I am counsel for Defendant Na El, Inc. in this matter. I make this declaration in support of Defendant's Reply Brief in Support of its Motion to Dismiss. The facts set forth herein are personally known by me to be true and correct and, if called as a witness, I could and would testify competently thereto.

2. Attached hereto as Exhibit 1 are true and correct copies of additional documents Na El produced to Plaintiff's counsel in this case in response to jurisdictional discovery requests.

3. Attached hereto as Exhibit 2 is a true and correct copy of a printout from the website of Pryor Cashman LLP, plaintiff's counsel, dated today.

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct.

Executed this 16th day of May, 2013 at Orangeburg, New York.

/s/ Michael D. Steger
MICHAEL D. STEGER